

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 16-cr-21

vs.

SAMY HAMZEH,

Defendant.

MOTION TO TRAVEL

Samy Hamzeh, by undersigned counsel, moves this Court for an order modifying his bond to allow him to travel to Wisconsin Dells from Saturday, June 19 to Monday, June 21, 2021.

In further support of this motion, Hamzeh invites the Court's attention to the following circumstances:

1. Hamzeh has been released on bond since July 27, 2018, and has complied with all conditions of release.
2. Hamzeh is seeking permission to travel to Wisconsin Dells with his wife and daughter from Saturday, June 19 to Monday, June 21, 2021, for a family vacation.
3. Hannah Graham from Pretrial Services has indicated that she does not oppose this request.
4. Counsel for the government, Kevin Knight, has indicated that the government does oppose this request, but should the Court grant it, they ask that Mr.

Hamzeh be required to: (1) submit to GPS monitoring; (2) provide Ms. Graham with a detailed itinerary, and (3) check in with Ms. Graham regularly to confirm he is following the proposed itinerary.

Hamzeh requests that the Court approve his request to travel to Wisconsin Dells from June 19 to June 21, 2021. If approved, Mr. Hamzeh will provide his itinerary, including his accommodations, to Ms. Graham, and contact Ms. Graham upon his return from the trip.

Dated at Milwaukee, Wisconsin this 17th day of June, 2021.

Respectfully submitted,

/s/ Craig W. Albee

Craig W. Albee, WI Bar #1015752

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